

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
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In Re:

Marie Claire Coulanges  
AKA Marie Claire Beaudin  
AKA Marie Claire Beaudin-Coulanges

Debtor

Case No.: 19-16501 (JKS)

Chapter: 13

Judge: Hon. John K. Sherwood

**REPLY BRIEF IN SUPPORT OF MOTION TO REINSTATE  
AUTOMATIC STAY WITH RESPECT TO DEBTOR'S HOME**

The debtor in the above-captioned case (the “Debtor”) hereby submits this reply brief in opposition to the objection (the “Objection”) filed by the Debtor’s mortgage servicer (the “Bank”) to the Debtor’s Motion to Reinstate Automatic Stay with Respect to the Debtor’s Home (the “Motion”).

At the outset, the Debtor notes that the main reason for the Debtor’s failure to make payments to the Bank was the unexpected illness and ultimate death of the Debtor’s adult daughter, Joanne Beaudin. Before her incapacitation, Ms. Beaudin handled much of the Debtor’s financial affairs related to the Debtor’s bankruptcy case. In Ms. Beaudin’s absence, the Debtor has enlisted the help of the Debtor’s adult son to try to facilitate prompt payments. The Debtor notes that she is current on trustee payments under her modified plan and is prepared to make payments to the Bank when the Bank is ready to accept them.



Strangely, the Bank has been unresponsive to the Debtor's counsel's efforts at a dialogue. The Debtor has cash in hand with which she would be ready to resolve this matter. Banks typically welcome attempts by their borrowers to repay obligations even when the borrowers fall behind. Even if the Debtor ultimately were to default on the modified plan that she proposes, the Bank would receive more funds than if the Motion were denied.

WHEREFORE, the Debtor requests that the Court enter an order confirming her Plan.

Dated this the 2nd day of December, 2022.

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